

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
HATTIESBURG DIVISION**

DERRICK STEVERSON

PLAINTIFF

VS.

CIVIL ACTION NO.:2:12-CV-00169-KS-MTP

**FORREST COUNTY MISSISSIPPI;
FORREST COUNTY SHERIFF'S DEPARTMENT;
FORREST COUNTY SHERIFF BILLY MCGEE;
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY;
COMMISSIONER ALBERT SANTA CRUZ;
TROOPER JAMIE ATKINS AND TROOPER
CLAY LOFTIN, Individually, and in their Professional
Capacity as Officers of the Mississippi Highway Patrol;
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,
AND DEPUTY RANDALL SMITH, Individually and in
their Professional Capacity as Officers of the Forrest County
Sheriff's Department; JOHN AND/OR JANE DOES 1-10**

DEFENDANTS

**RESPONSE TO MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE**

Defendants, **FORREST COUNTY MISSISSIPPI, FORREST COUNTY SHERIFF'S
DEPARTMENT, FORREST COUNTY SHERIFF BILLY MCGEE, DEPUTY MATT
FINDLEY, CAPTAIN GLEN MOORE, AND DEPUTY RANDALL SMITH, Individually
and in their Professional Capacity as Officers of the Forrest County Sheriff's Department,**
file this their Response to Motion for Extension of Time to File Responses and would state the
following, to-wit:

I.

The Defendants **FORREST COUNTY MISSISSIPPI, FORREST COUNTY
SHERIFF'S DEPARTMENT, FORREST COUNTY SHERIFF BILLY MCGEE,
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE, AND DEPUTY RANDALL**

SMITH, Individually and in their Professional Capacity as Officers of the Forrest County Sheriff's Department have no objection to the Plaintiff's request for extension of time to file responses.

II.

That the Defendants **FORREST COUNTY MISSISSIPPI, FORREST COUNTY SHERIFF'S DEPARTMENT, FORREST COUNTY SHERIFF BILLY MCGEE, DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE, AND DEPUTY RANDALL SMITH, Individually and in their Professional Capacity as Officers of the Forrest County Sheriff's Department** intend to file similar motions by Monday, October 29, 2012, at the latest.

III.

That in the best interest of judicial economy some of the responses may be similar in nature and giving Plaintiff additional time to respond to both sets of Defendants motions may possibly stream line this litigation and these Defendants have no objection to the Plaintiff being granted an extension of time to respond.

RESPECTFULLY SUBMITTED, this the 19th day of October 2012.

FORREST COUNTY MISSISSIPPI, FORREST COUNTY SHERIFF'S DEPARTMENT, FORREST COUNTY SHERIFF BILLY MCGEE, DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE, AND DEPUTY RANDALL SMITH, INDIVIDUALLY AND IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF THE FORREST COUNTY SHERIFF'S DEPARTMENT

BY: s/James K. Dukes, Jr.
JAMES K. DUKES, JR., ATTORNEY FOR DEFENDANTS

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CERTIFICATE

I, JAMES K. DUKES, JR., Attorney for the Defendants, FORREST COUNTY
MISSISSIPPI, FORREST COUNTY SHERIFF'S DEPARTMENT, FORREST COUNTY
SHERIFF BILLY MCGEE, DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE, AND
DEPUTY RANDALL SMITH INDIVIDUALLY AND IN THEIR PROFESSIONAL
CAPACITY AS OFFICERS OF THE FORREST COUNTY SHERIFF'S DEPARTMENT, do
hereby certify that on the 19th day of October, 2012, I electronically filed the foregoing
with the Clerk of Court using the ECF system which sent notification of such filing to the
following:

Peter H. Barrett
William C. Barrett
Attorneys for the Plaintiff
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

s/ James K. Dukes, Jr.

JAMES K. DUKES, JR.